

Arguments/Remarks

Claims 1-18 have been cancelled. New claims 19-34 have been added.

Rejections under 35 U.S.C. § 102

Claims 1-8 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,338,669 to Togawa et al. ("*Togawa*"). However, claims 1-8 have been cancelled. Therefore, this rejection as it relates to claims 1-8 is moot.

Claims 1-3, 5-12, 14-16, and 18 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,722,943 to Michael J. Joslyn ("*Joslyn*"). However, claims 1-3, 5-12, 14-16, and 18 have been cancelled. Therefore, this rejection as it relates to claims 1-3, 5-12, 14-16, and 18 is moot.

Rejections under 35 U.S.C. § 103

Claims 4, 12, and 17 were rejected under 35 U.S.C. § 103(a) as being obvious over *Joslyn* in view of *Togawa*. However, claims 4, 12, and 17 have been cancelled. Therefore, this rejection as it relates to claims 4, 12, and 17 is moot.

Claims 10, 11, and 13 were rejected under 35 U.S.C. § 103(a) as being obvious over *Joslyn* in view of U.S. Patent No. 6,602,436 to Mandigo et al. ("*Mandigo*"). However, claims 10, 11, and 13 have been cancelled. Therefore, this rejection as it relates to claims 10, 11, and 13 is moot.

New Claims

New claims 19-34 including new independent claims 19 and 27 have been added. These claims recite features that are not taught or suggested in *Togawa*, *Joslyn* and/or *Mandigo*. For example, new independent claim 19 recites, among other things, "a control system coupled to the slurry arm to selectively position the slurry arm over the polishing pad, said position based at least on a first anticipated location of a substrate to be polished using the polishing pad at a first point in time." Such features are not taught or suggested by *Togawa*, *Joslyn* and/or *Mandigo*. For at least this

reason, claim 19 is patentable over *Togawa, Joslyn and/or Mandigo*. New independent claim 27 has features similar to those of claim 19 and is therefore, likewise patentable over *Togawa, Joslyn and/or Mandigo*. New claims 20-26 and 28-34 depend from independent claims 19 and 27, incorporating their recitations respectively. Accordingly, for at least the same reasons, claims 20-26 and 28-34 are patentable over *Togawa, Joslyn and/or Mandigo*.

Conclusion

In view of the foregoing, the Applicants respectfully submit that claims 19-34 are in condition for allowance. Early issuance of Notice of Allowance is respectfully requested.

If the Examiner has any questions, he is invited to contact the undersigned at 503-796-2099.


The Commissioner is hereby authorized to charge shortages or credit overpayments to Deposit Account No. 500393.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

Dated: _____

2/22/06
Pacwest Center, Suite 1900
1211 SW Fifth Avenue
Portland, Oregon 97204
Telephone: 503-222-9981



James J. Namiki, Reg. No. 51,148